

# EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**JEFFREY B. MOULD**

\*

**Plaintiff**

\*

**v.**

\*

**CASE NO. 1:13-cv-01305-JKB**

**NJG FOOD SERVICE, INC., et al.**

\*

**Defendants**

\*

\* \* \* \* \*

**AFFIDAVIT OF JULIA A. CAROLAN IN SUPPORT OF  
PLAINTIFF TAYLOR SCHLETTE’S MOTION FOR ATTORNEYS’ FEES AND COSTS**

1. I, JULIA A. CAROLAN, am over the age of eighteen and competent to testify, and state as follows:

2. I am an attorney at the firm of Thomas & Libowitz, P.A. and submit this affidavit in support of Taylor Schlette’s Motion for Attorneys’ Fees and Costs. I have served as co-counsel for Ms. Schlette in the above-captioned action, as well as co-counsel for the plaintiffs in the collective and class action of which she was an opt-in plaintiff, and co-counsel for Jeffrey B. Mould, a single plaintiff in the case that was consolidated with the collective and class action in the above-captioned matter.

3. I graduated *Summa Cum Laude* with my B.S. degree from the University of Pittsburgh in 2003. I graduated *Cum Laude* with my J.D. from the University of Maryland School of Law in May 2006. At graduation from the University of Maryland School of Law, I was awarded Order of the Barristers. During law school, I was a member of the University of Maryland School of Law’s National Trial Team, and served as co-captain of the team during my third year. I was also an Associate Editor on the *Journal of Health Care Law and Policy*. I was

admitted to the Maryland bar in December 2006 and admitted to the bar of this Court in August 2007. I was admitted to the bar of the U.S. District Court for the Eastern District of Michigan in 2009. I have been named a “Rising Star” in the area of general litigation for the years 2012, 2013 and 2014 by Maryland Super Lawyers magazine.

4. After graduating from law school, I clerked for the Honorable Gale E. Rasin of the Circuit Court for Baltimore City. Following my clerkship, in June 2007, I began working as a litigation associate at Astrachan Gunst Thomas, P.C. I began working as a litigation associate with Thomas & Libowitz, P.A. in March 2011. Through my practice both at Astrachan Gunst Thomas and at Thomas & Libowitz, I have represented clients in federal and state court matters, as well as matters at the administrative level, involving complex business/commercial and labor and employment litigation. Much of my work, especially since joining Thomas & Libowitz, has focused on labor and employment matters, through both the litigation of such matters and advising clients on employment issues. I have lectured at a National Business Institute Continuing Education Seminar entitled “Employment Laws Made Simple.”

5. Valerie J. Longo is a paralegal with Thomas & Libowitz, P.A. Ms. Longo graduated from George Mason University’s Certified Paralegal Program in December 2006. Ms. Longo has worked in the legal field since 1977. Prior to her current position as paralegal at Thomas & Libowitz, she worked as a legal assistant at Whiteford, Taylor & Preston where she performed paralegal duties on a daily basis. Ms. Longo was given the responsibility of handling the entire medical component in the defense of asbestos litigation. Her duties in that regard were complex and included scheduling hundreds of plaintiffs for independent medical examinations and tests, gathering and organizing pertinent medical records and information for expert review, and coordinating and working with the expert witnesses.

6. Ms. Longo began working at Thomas & Libowitz in January 2002 as a litigation legal assistant who also performed paralegal duties as needed, and since 2006 has functioned exclusively as a litigation paralegal. Ms. Longo's work in Thomas & Libowitz's litigation department involves a great deal of work on employment related litigation. In addition to typical paralegal duties involving document organization and retention, facilitating and organizing document productions, finalizing and filing court papers, Ms. Longo also has extensive experience in employment related matters involving, for example, review and compilation of complex payroll and related records.

7. The work performed in connection with Plaintiff Schlette was entirely contingent on success.

8. The hourly billing rates for the individuals chiefly active in this case are as follows:

Francis R. Laws	\$450
Martin E. Wolf	\$500
Julia A. Carolan	\$235 <sup>1</sup>
Valerie J. Longo	\$140

9. For purposes of this Motion and with respect to Plaintiff Schlette, Plaintiff has not billed and does not request compensation with respect to any time expended by Messrs. Laws and Wolf. Mr. Laws did expend some time reviewing pleadings, reviewing the Offer of Judgment to Ms. Schlette and sending emails to opposing counsel regarding such offer. Further, where there were intra-office conferences between Ms. Carolan and Mr. Laws and/or Mr. Wolf, we have billed the time at my hourly rate, even though we could have billed it at the rate of the more senior lawyer involved, either Mr. Laws or Mr. Wolf, per Appendix B Rules and Guidelines For Determining Attorneys' Fees in Certain Cases.

---

<sup>1</sup> My rate increased to \$250 as of January 1, 2014, but has continued to be billed at \$235 for purposes of this Motion.

10. In connection with Plaintiff Schlette we have billed 32.70 hours of my time and 4.70 hours of Ms. Longo's time. The hours requested herein were entered onto Thomas & Libowitz's "TimeSlips" software. Exhibit 2 to this Motion represents the true and correct records of time entries, which are contemporaneously kept and maintained by Thomas & Libowitz.

11. Based on my experience, our hourly rates are comparable to the hourly rates charged by other attorneys and paralegals with similar skills and experience in similar areas of the country.

12. Based on my experience, the hourly rates requested are reasonable. I have been admitted to the bar for over seven years, and my hourly rate of \$235 falls squarely within the guidelines for an attorney admitted to the bar for 5 – 8 years (\$165-250). Ms. Longo's hourly rate of \$140 is slightly higher than that set forth in the guidelines for a paralegal or law clerk (\$95-115). However, given the number of years Ms. Longo has worked in the legal field (37 years), her extensive work as a paralegal, and her excellent abilities as a paralegal as observed by me, I believe her hourly rate is reasonable.

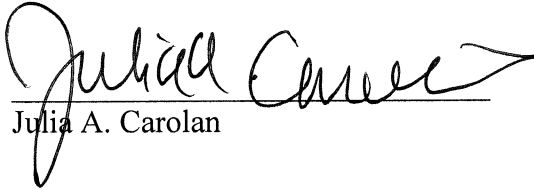
13. The fee requested herein of \$7,987.50 was calculated by multiplying the hourly rates of each individual times the number of hours billed by that individual.

14. Thomas & Libowitz records and maintains its expenses incurred in each matter in its TimeSlips software. The only expense requested herein in connection with Taylor Schlette is that of the mileage costs reimbursed to me by Thomas & Libowitz for my travel to Ocean City, Maryland. Specifically, as set forth in Exhibit 2 to the Motion, Thomas & Libowitz reimbursed me \$153.30 for this trip, which was calculated by multiplying the number of miles (271.32) by the rate permitted for official government travel (\$0.565 per mile).

15. Between costs and fees, Plaintiff Schlette requests a total of \$8,140.80 through this Motion. The legal services rendered as set forth herein were necessary services to be performed in this matter in order to obtain the judgment awarded to Plaintiff Schlette. Further, the fees and expenses incurred were fair and reasonable for the services that were required.

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE CONTENTS OF THE FOREGOING PAPER ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Date: January 22, 2014

  
\_\_\_\_\_  
Julia A. Carolan